# Case 1:19-cv-05434-VM-RWL Document 354 Filed 01/07/20 Page 1 of 12

# CLEARY GOTTLIEB STEEN & HAMILTON LLP

**NEW YORK** 

PARIS

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MOSCOW

ROME 2112 Pennsylvania Avenue, NW Washington, DC 20037-3229 MILAN T: +1 202 974 1500 JAN 7 - 2020 HONG KONG F: +1 202 974 1999 BEIJING CHAMBERS OF clearygottlieb.com **UENOS AIRES** JUDGE MARRERO SÃO PAULO ABU DHABI D: +1 (202) 974-1680

January 6, 2020

msolomon@cgsh.com

## BY HAND

The Honorable Victor Marrero Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED:

SEOUL

State of New York, et al. v. Deutsche Telekom AG, et al., No. 1:19-cv-05434-Re: VM-RWL (S.D.N.Y.)

Dear Judge Marrero,

On behalf of all Defendants, we respectfully request this Court's endorsement on the following requests:

- Projector and Screen. Defendants respectfully request use of the Court's available audio visual equipment, which we understand include a projector and screen(s), for additional viewing capabilities of all parties' documents.
- Additional Table Area. Defendants respectfully request additional tables to be added to the counsel section in the front of the court room, to the extent space permits.
- Reserved Seating. Defendants respectfully request that gallery benches be reserved for Defendants' in-house personnel (approximately 20 seats) and additional outside counsel (approximately 20 seats).

Please let us know if you have any questions. Thank you for your consideration.

SO ORDERED.

cc: All Counsel of Record (via e-mail)

Respectfully yours,

Matthew Solomon/ K.G.

Matthew Solomon

# Case 1:19-cv-05434-VM-RWL Document 354 Filed 01/07/20 Page 2 of 12

#### CLEARY GOTTLIEB STEEN & HAMILTON LLP

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January 6, 2020

## **BY HAND**

The Honorable Victor Marrero Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

Re: <u>State of New York, et al. v. Deutsche Telekom AG, et al., No. 1:19-cv-05434-VM-RWL (S.D.N.Y.)</u>

Dear Judge Marrero,

As counsel for Defendants, we respectfully request this Court's endorsement through the Proposed Order enclosed herein for the listed attorneys to access SDNY Courtroom WiFi during closing arguments in the above-captioned matter.

Thank you for your consideration. Please let me know if you have any questions.

Respectfully yours,

Matthew Solomon / K.G.

Matthew Solomon

cc: All Counsel of Record (via e-mail)

UNITED	STATES	DISTRIC	CT COU	JRT
SOUTHE	ERN DIST	TRICT OF	NEW	YORK

IN THE MATTER OF AN APPLICATION
TO BRING PERSONAL ELECTRONIC DEVICE(S)
OR GENERAL PURPOSE COMPUTING DEVICE(S)
INTO THE COURTHOUSES OF THE
SOUTHERN DISTRICT OF NEW YORK
FOR USE IN A PROCEEDING OR TRIAL

The following Order is subject to the definitions, obligations and restrictions imposed pursuant to Standing Order M10-468, as Revised. Upon submission of written application to this Court, it is hereby

ORDERED that the following attorney(s) are authorized to bring Personal Electronic Device(s) and/or the General Purpose Computing Device(s) (collectively, "Devices") listed below into the Courthouse for use in a proceeding or trial in the action captioned *State of New York, et al. v. Deutsche Telekom AG, et al.*, No. 19-cv-5434.

ORDERED that for the device(s) checked below SDNY Courtroom WiFi access shall be provided.

The date(s) for which authorization is provided is January 15, 2020.

Attorney	Email	Device(s)	Courtroom	Wi-Fi Granted
David Gelfand	dgelfand@cgsh.com	1 cell phone, 1 laptop	23B	
Mark Nelson	mnelson@cgsh.com	1 cell phone, 1 laptop	23B	
George Cary	gcary@cgsh.com	1 cell phone, 1 laptop	23B	
Matthew Solomon	msolomon@cgsh.com	1 cell phone, 1 laptop	23B	
James Hunsberger	jhunsberger@cgsh.com	1 cell phone, 1 laptop	23B	
Linden Bernhardt	lbernhardt@cgsh.com	1 cell phone, 1 laptop	23B	
David Meyer	dmeyer@mofo.com	1 cell phone, 1 laptop	23B	

Attorney	Email	Device(s)	Courtroom	Wi-Fi Granted
Steve Sunshine	Steve.Sunshine@skadden.com	1 cell phone, 1 laptop	23B	
Karen Hoffman Lent	karen.lent@skadden.com	1 cell phone, 1 laptop	23B	
Hallie Levin	hallie.levin@wilmerhale.com	1 cell phone, 1 laptop	23B	
Josh Soven	jsoven@wsgr.com	1 cell phone, 1 laptop	23B	

The attorney(s) identified in this Order must present a copy of this Order when entering the Courthouse. Bringing any authorized Device(s) into the Courthouse or its Environs constitutes a certification by the attorney that he or she will comply in all respects with the restrictions and obligations set forth in Standing Order M10-468, as Revised.

Victor Marrero United States Judge

SO ORDERED:

Dated:

2

# Case 1:19-cv-05434-VM-RWL Document 354 Filed 01/07/20 Page 5 of 12

#### CLEARY GOTTLIEB STEEN & HAMILTON LLP

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D: +1 (202) 974-1680 msolomon@cgsh.com SUENOS AIRES SÃO PAULO ABU DHABI SEOUL

January 6, 2020

#### BY HAND

The Honorable Victor Marrero Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

Re: <u>State of New York, et al. v. Deutsche Telekom AG, et al., No. 1:19-cv-05434-VM-RWL (S.D.N.Y.)</u>

Dear Judge Marrero,

As counsel for Defendants, we respectfully request this Court's endorsement through the Proposed Order enclosed herein for the listed individual to bring electronic devices into the Courthouse for use during closing arguments in the above-captioned matter. Consistent with the parties' joint request to the Court during the December 6, 2019 pretrial conference (see Tr. 50:16-51:3), it is essential for Defendants to have assistance from a trial technology consultant, Mr. Andrew Klein, during the closing argument presentation. See ECF No. 332 (granting Defendants' request for Mr. Klein to bring necessary technology equipment to trial).

Thank you for your consideration. Please let me know if you have any questions.

Respectfully yours,

Matthew Solomon/K.G.

Matthew Solomon

cc: All Counsel of Record (via e-mail)

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN THE MATTER OF AN APPLICATION
TO BRING PERSONAL ELECTRONIC DEVICE(S)
OR GENERAL PURPOSE COMPUTING DEVICE(S)
INTO THE COURTHOUSES OF THE
SOUTHERN DISTRICT OF NEW YORK
FOR USE IN A PROCEEDING OR TRIAL

-----X

The following Order is subject to the definitions, obligations and restrictions imposed pursuant to Standing Order M10-468, as Revised. Upon submission of written application to this Court, it is hereby

ORDERED that the following individual is authorized to bring Personal Electronic Device(s) and/or the General Purpose Computing Device(s) (collectively, "Devices") listed below into the Courthouse for use in a proceeding or trial in the action captioned *State of New York, et al. v. Deutsche Telekom AG, et al.*, No. 19-cv-5434.

The date(s) for which authorization is provided is January 15, 2020.

Individual	Device(s)
Andrew Klein (Trial Technology Consultant)	2 laptop computers; 1 cell phone; power cords, cables & mouse controllers; 1 mouse; 2 external hard drives; power cords & cables; video adapter cables and connectors; headphones; 1 Powerpoint clicker

The individual identified in this Order must present a copy of this Order when entering the Courthouse. Bringing any authorized Device(s) into the Courthouse or its Environs constitutes a certification by the individual that he or she will comply in all respects with the restrictions and obligations set forth in Standing Order M10-468, as Revised.

SO ORDERED:

Dated.

Victor Marrero

United States Judge

# Case 1:19-cv-05434-VM-RWL Document 354 Filed 01/07/20 Page 7 of 12

# CLEARY GOTTLIEB STEEN & HAMILTON LLP

ROME 2112 Pennsylvania Avenue, NW **NEW YORK** Washington, DC 20037-3229 MILAN **PARIS** T: +1 202 974 1500 HONG KONG BRUSSELS F: +1 202 974 1999 BEIJING LONDON **BUENOS AIRES** clearygottlieb.com FRANKFURT SÃO PAULO ABU DHABI COLOGNE D: +1 (202) 974-1680 msolomon@cgsh.com **SEOUL** MOSCOW

January 6, 2020

#### BY HAND

The Honorable Victor Marrero Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

Re: <u>State of New York, et al. v. Deutsche Telekom AG, et al., No. 1:19-cv-05434-VM-RWL (S.D.N.Y.)</u>

Dear Judge Marrero,

As counsel for Defendants, we respectfully request this Court's endorsement through the Proposed Order enclosed herein for the listed attorneys to bring electronic devices into the Courthouse for use during closing arguments in the above-captioned matter.

Thank you for your consideration. Please let me know if you have any questions.

Respectfully yours,

Matthew Solomon / K.G.

Matthew Solomon

cc: All Counsel of Record (via e-mail)

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK	x
IN THE MATTER OF AN APPLICATION TO BRING PERSONAL ELECTRONIC DEVICE OR GENERAL PURPOSE COMPUTING DEVIC INTO THE COURTHOUSES OF THE SOUTHERN DISTRICT OF NEW YORK FOR USE IN A PROCEEDING OR TRIAL	
The following Order is subject to the defin	nitions, obligations and restrictions imposed
pursuant to Standing Order M10-468, as Revise	d. Upon submission of written application to
this Court, it is hereby	
ORDERED that the following attorney(s)	are authorized to bring the Personal Electronic
Device(s) and/or the General Purpose Computing	ng Device(s) (collectively, "Devices") listed below
into the Courthouse for use in a proceeding or tr captionedState of New York, et al. v. Deutsche Teleko	ial in the action om AG, et al.
	, No. <sup>19-cv-5434</sup>
The date(s) for which such authorization is provi	ded is (are) January 15, 2020
Attorney	Device(s)
1. See Attachment A.	
2.	
3.	
(Attach Extra S	heet if Needed)
The attorney(s) identified in this Order methe Courthouse. Bringing any authorized Device constitutes a certification by the attorney that he restrictions and obligations set forth in Standing	or she will comply in all respects with the
SO ORDERED:	
Dated: Taknuary 2020	
	Victor Marrero
	United States Judge

# ATTACHMENT A

Attorney	Device(s)	
David Gelfand (Partner, Cleary Gottlieb Steen & Hamilton LLP)	1 cellular phone; 1 laptop computer	
Matthew Solomon (Partner, Cleary Gottlieb Steen & Hamilton LLP)	1 cellular phone; 1 laptop computer	
Mark Nelson (Partner, Cleary Gottlieb Steen & Hamilton LLP)	1 cellular phone; 1 laptop computer	
George Cary (Partner, Cleary Gottlieb Steen & Hamilton LLP)	1 cellular phone; 1 laptop computer	
James Hunsberger (Associate, Cleary Gottlieb Steen & Hamilton LLP)	1 cellular phone; 1 laptop computer	
Linden Bernhardt (Associate, Cleary Gottlieb Steen & Hamilton LLP)	1 cellular phone; 1 laptop computer	
Tara Tavernia (Associate, Latham & Watkins LLP)	1 cellular phone; 1 laptop computer	
Richard Parker (Partner, Gibson, Dunn & Crutcher LLP)	1 cellular phone; 1 laptop computer	
David Meyer (Partner, Morrison & Foerster LLP)	1 cellular phone; 1 laptop computer	
Jeffrey Jaeckel (Partner, Morrison & Foerster LLP)	1 cellular phone; 1 laptop computer	
Steve Sunshine (Partner, Skadden, Arps, Slate, Meagher & Flom LLP)	1 cellular phone; 1 laptop computer	
Karen Hoffman Lent (Partner, Skadden, Arps, Slate, Meagher & Flom LLP)	1 cellular phone; 1 laptop computer	
Joseph Rancour (Associate, Skadden, Arps, Slate, Meagher & Flom LLP)	1 cellular phone; 1 laptop computer	
Hallie Levin (Partner, Wilmer Cutler Pickering Hale and Dorr LLP)	1 cellular phone; 1 laptop computer	
David Gringer (Partner, Wilmer Cutler Pickering Hale and Dorr LLP)	1 cellular phone; 1 laptop computer	
Jeremy Adler (Counsel, Wilmer Cutler Pickering Hale and Dorr LLP)	1 cellular phone; 1 laptop computer	
Joshua Soven (Partner, Wilson Sonsini Goodrich & Rosati)	1 cellular phone; 1 laptop computer	

Attorney	Device(s)	
Brad Tennis (Associate, Wilson Sonsini Goodrich & Rosati)	1 cellular phone; 1 laptop computer	
Dave Miller (Executive Vice President, General Counsel and Secretary, T-Mobile US, Inc.)	1 cellular phone; 1 laptop computer	
Laura Buckland (Senior Vice President, Litigation & IP, T-Mobile US, Inc.)	1 cellular phone; 1 laptop computer	
Melissa Scanlan (Vice President, IP & Antitrust, T-Mobile US, Inc.)	1 cellular phone; 1 laptop computer	
Ellen Blanchard (Managing Corporate Counsel, eDiscovery, T-Mobile US, Inc.)	1 cellular phone; 1 laptop computer	
Bradley Meissner (Director, Legal Affairs, T-Mobile US, Inc.)	1 cellular phone; 1 laptop computer	
Wolfgang Kopf (Senior Vice President for Group Public and Regulatory Affairs, Deutsche Telekom AG)	1 cellular phone; 1 laptop computer	
Reinhard Wieck (Managing Director & President, Deutsche Telekom Inc.)	1 cellular phone; 1 laptop computer	
Mary Jean Fell (Senior Counsel, Sprint Corporation)	1 cellular phone; 1 laptop computer	

# Case 1:19-cv-05434-VM-RWL Document 354 Filed 01/07/20 Page 11 of 12

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SÃO PAULO
ABU DHABI

SEOUL

January 6, 2020

## **BY HAND**

The Honorable Victor Marrero Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

Re: <u>State of New York, et al. v. Deutsche Telekom AG, et al., No. 1:19-cv-05434-VM-RWL (S.D.N.Y.)</u>

Dear Judge Marrero,

On behalf of all Defendants, we respectfully request this Court's permission for Globalink Worldwide Express Ltd. to enter the Courthouse to deliver and retrieve our boxes and to help with lunch deliveries on January 15, 2020. Attachment A lists the names of the individuals and vehicles we expect to be involved with these deliveries.

Please let us know if you have any questions. Thank you for your consideration.

Respectfully yours,

Matthew Solomon

cc: All Counsel of Record (via e-mail)

SO ORDERED. REQUEST GRANTED

Matthew Solomon K.G.

Cleary Gottlieb Steen & Hamilton LLP or an affiliated entity has an office in each of the cities listed above.

## ATTACHMENT A

Courier Names
Justin Concepcion
Kishor Persad
Tomas Concepcion
Hector Concepcion

# **Vehicle Information**

Make: Mazda Model: MPV Year: 2003

License Plate: GEF 4155, New York

Make: Volkswagen Model: Atlas Year: 2019

License Plate: JFY 3553, New York